

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,)	
)	
v.)	No. 1:19-cr-59
)	
DANIEL EVERETTE HALE,)	Hon. Liam O’Grady
)	
Defendant.)	Sentencing: July 13, 2021

UNOPPOSED MOTION TO CONTINUE SENTENCING BY TWO WEEKS

COMES NOW the defendant, Daniel Hale, through counsel, and moves this Honorable Court for a short, two-week continuance of the sentencing hearing in this matter to July 27, 2021. Undersigned counsel has conferred with government counsel, who does not object to the requested brief continuance.

The defense has been diligently working to prepare for sentencing in Mr. Hale’s case, however, a number of unexpected circumstances have arisen that have affected counsel’s preparation on the existing schedule. First, one of undersigned counsel has had to travel frequently in recent weeks on a personal matter. While preparation for Mr. Hale’s sentencing has continued apace, counsel’s schedule has resulted in some minor delays in the preparation of certain issues relevant for sentencing.

Second, Mr. Hale’s incarceration in May has made obtaining certain records and contact information somewhat more difficult than the defense previously had anticipated. In particular, contact with Mr. Hale has been constrained due to the vagaries of the Alexandria jail’s telephone and meeting schedule, not least because

inmates at the jail are locked down in quarantine for the first few weeks after they arrive. The defense is working through these issues, however, they have caused some minor setbacks to the sentencing preparation.

Mr. Hale faces the threat of a significant sentence in this case. The government has repeatedly made clear to the defense that it will seek a sentence of years of incarceration. Preparing a thorough sentencing presentation with a complete picture of any mitigating circumstances in Mr. Hale's life is critical. The defense seeks a very short continuance to ensure that it has sufficient time to gather and present the fullest picture of Mr. Hale's history and characteristics. The government does not oppose the requested two week continuance.

For the foregoing reasons, the defense respectfully moves this Court to continue the sentencing hearing in this matter by two weeks to July 27, 2021.

Respectfully Submitted,

DANIEL EVERETTE HALE

By Counsel,

Jeremy C. Kamens

Federal Public Defender

/s/

Todd M. Richman

Va. Bar No. 41834

Cadence A. Mertz

Va. Bar No. 89750

Counsel for Mr. Hale

1650 King Street, Suite 500

Alexandria, Virginia 22314

Telephone: (703) 600-0845

Facsimile: (703) 600-0880

Todd_Richman@fd.org

CERTIFICATE OF SERVICE

I hereby certify that on June 2, 2021, I filed the foregoing via the CM/ECF system, which will electronically serve a copy upon all counsel of record.

/s/

Cadence Mertz

Va. Bar No. 89750

Assistant Federal Public Defender

Office of the Federal Public Defender

1650 King Street, Suite 500

Alexandria, Virginia 22314

Telephone: (703) 600-0840

Facsimile: (703) 600-0880

Cadence_Mertz@fd.org